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February 15, 2021

The Honorable Paul A. Engelmayer District Judge Southern District of New York Thurgood Marshall United States Court House 40 Foley Square New York, N.Y. 10007

United States of America v. Larry D. Meyers, 19-CR-429 (PAE)

Dear Judge Engelmayer:

I write on behalf of Larry D. Meyers respectfully requesting that the Court grant him early termination of his supervised release. This request comes upon recommendation by his U.S. Probation Officer for the Southern District of New York Zondra Jackson and with no objection from the government.

On November 21, 2019, you sentenced Mr. Meyers on his guilty plea to one count of a Conspiracy to Violate the Sherman Antitrust Act, 15 U.S.C. § 1. Mr. Meyers entered his guilty plea after fully cooperating with the government in its investigation of the unlawful conspiracy. In your judgment, you sentenced Mr. Meyers to 200 hours of community service and two years of supervised release with the special conditions that he be supervised in the district of his residence and submit himself, his residence, place of business, vehicle, and any other property or personal electronic device under his control to search.

Since commencing his supervision in November 2019, Mr. Meyers has complied or is complying with all the terms of his sentence. He has maintained his supervision in the Southern District of New York, the district in which he resides. On February 6, 2020, Mr. Meyers completed his 200th hour of community service, volunteering nearly 40-hours a week at God's Love We Deliver, a local charity that prepares and delivers high-quality meals to people living with HIV/AIDS, cancer, and other serious illnesses. And he has successfully completed more than one year of his two-year supervision without any technical violations or new criminal activity. In fact, Ms. Jackson was the first to suggest that Mr. Meyers may be eligible for early termination.

## Case 1:19-cr-00429-PAE Document 39 Filed 02/13/21 Page 2 of 2

Hon. Paul A. Engelmayer February 5, 2021 Page 2

The Court has the power to terminate the remaining nine months of Mr. Meyers's supervision. Under 18 U.S.C. § 3583(e)(1), a court may "terminate a term of supervised release . . . at any time after the expiration of one year of supervised release . . . if it is satisfied that such action is warranted by the conduct of the defendant released and the interest of justice."

Mr. Meyers's conduct warrants granting him early termination. Mr. Meyers's conduct has been exemplary since his involvement in the investigation by the Antitrust Division. As was reflected in the government's sentencing submission, Mr. Meyers fully cooperated with the government in its investigation of the conspiracy. He has completed the community-service portion of his sentence. He has maintained a positive and constructive relationship with his Probation Officer. He has earned no demerits under supervision. And he has devoted much of his time to his family and children. As stated above, the trial attorneys who prosecuted this case on behalf of the Antitrust Division of the U.S. Department of Justice have reviewed this request, are familiar with the circumstances of Mr. Meyers's conduct while under supervision, and do not object to the request to grant him early termination.

Just as his conduct warrants early termination, so too does the interest of justice. Mr. Meyers is currently employed as a sales person at RegAlytics, Inc. and supplements his family's income by doing consulting work whenever possible. Mr. Meyers wishes to pursue employment in the securities field, but to do so he will need to overcome the statutory disqualification based on his criminal conviction. Obtaining early termination will help Mr. Meyers in the reinstatement process with FINRA, which in turn will help Mr. Meyers support his family and ultimately return to being a fully productive member of society.

For the reasons stated above, I respectfully request that this Court follow the recommendation of the U.S. Probation Office and grant Mr. Meyers's request for early termination of his supervised release.

Respectfully submitted,

Casey Erin Lucier

Copies to (via ECF and courtesy copy by email):

Zondra Jackson, United States Probation Office for the Southern District of New York Christina Brown, Antitrust Division of the U.S. Department of Justice

**GRANTED.** The Court wishes Mr. Meyers well. The Clerk of Court is requested to terminate the motion at Dkt. No. 37.

SO ORDERED.

2/17/2021

PAUL A. ENGE MAYER United States District Judge